

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	CRIMINAL NO. _____
<b>v.</b>	:	DATE FILED: _____
<b>NAQUOR BERRY</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 922(g)(1) (possession of</b>
	:	<b>ammunition by a felon – 1 count)</b>
	:	<b>21 U.S.C. § 841(a)(1), (b)(1)(D)</b>
	:	<b>(possession with intent to distribute</b>
	:	<b>marijuana)</b>
	:	<b>18 U.S.C. § 924(c)(1) (possession of a</b>
	:	<b>firearm in furtherance of a drug</b>
	:	<b>trafficking crime – 1 count)</b>
		<b>Notices of forfeiture</b>

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about September 12, 2021, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**NAQUOR BERRY,**

knowing he had previously been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, that is at least one of the following, 10 live rounds of PMC, .223 Remington ammunition and one live round of Federal S&W, .40 caliber ammunition, and the ammunition was in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 12, 2020, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**NAQUOR BERRY**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, for remuneration.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 12, 2021, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**NAQUOR BERRY**

knowingly possessed a firearm, that is, an AR-15 style semi-automatic pistol, with no serial number, loaded with 11 live rounds of ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Two of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

**NOTICE OF FORFEITURE 1**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Sections 922(g)(1) and 924(c), set forth in this indictment, defendant

**NAQUOR BERRY**

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such violation, including, but not limited to:

1. a model AR-15 style semi-automatic pistol, with no serial number, seized on September 12, 2021, in Philadelphia, Pennsylvania;
2. ten live rounds of PMC, .223 Remington ammunition; and
3. one live round of Federal, S&W .40 caliber ammunition;

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**NOTICE OF FORFEITURE 2**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 21, United States Code, Section 841(a)(1), set forth in this indictment, defendant

**NAQUOR BERRY**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, including, but not limited to:

- i. a model AR-15 style semi-automatic pistol, with no serial number seized on September 12, 2021, in Philadelphia, Pennsylvania;
- ii. ten live rounds of PMC, .223 Remington ammunition; and
- iii. one live round of Federal, S&W .40 caliber ammunition;

(b) any property constituting, or derived from, proceeds obtained, directly or indirectly, from the commission of such violation, and:

2. If any of the property subject to forfeiture, as a result of any act or

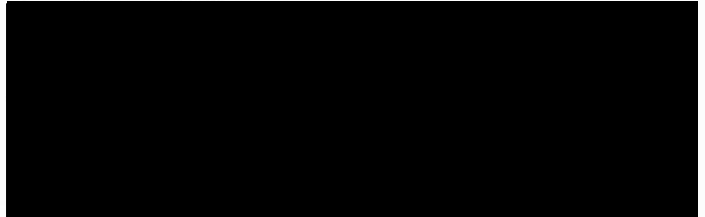
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided


without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**



  
**JENNIFER ARBITTIER WILLIAMS**  
United States Attorney

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**NAQUOR BERRY**

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**INDICTMENT**

**Counts**

18 U.S.C. § 922(g)(1) (possession of ammunition by a felon – 1 count)

21 U.S.C. § 841(a)(1), (b)(1)(D) (possession with intent to distribute marijuana)

18 U.S.C. § 924(c)(1) (possession of a firearm in furtherance of a drug trafficking crime – 1 count)

Notices of forfeiture

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Of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

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Bail, \$ \_\_\_\_\_

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